

Chief Executives – Scottish Local Authorities
Copy and email: Local Authority Building Standards Managers (LABSS)

Our ref: A10277766
5 February 2015

Dear Chief Executive

**Whisky Maturation Warehouses - Storage Buildings (Class 1)
The Building (Scotland) Act 2003 and The Building (Scotland) Regulations 2004 –
Standard 2.1 Compartmentation and Standard 2.6 Spread to neighbouring buildings**

I am writing to all local authorities about fire safety concerns that have been raised over the guidance contained in the Technical Handbook for non-domestic buildings which supports mandatory Building Standard 2.1: Compartmentation and Standard 2.6: Spread to neighbouring buildings as it relates to whisky maturation warehouses.

Building Standards Division (BSD) was made aware of a significant emerging problem in Autumn 2012 regarding sprinkler installations in whisky maturation warehouses. A number of major differences became apparent between the withdrawn standard BS 5306-2 (Fire extinguishing installations and equipment on premises, Part 2 Specification for sprinkler systems) and BS EN 12845 (Fixed firefighting systems – Automatic sprinkler systems – Design, installation and maintenance). The key differences include the maximum area and maximum height of free standing / block stacking wooden barrels on pallets where the building is fitted with ceiling sprinklers only. The reference in BS EN 12845 Annex G.6 to wooden barrels containing spirit based liquors to be stored to a height not exceeding 4.6m is particularly problematic for the whisky industry since free standing or block stacking up to 6-7 barrel high has been normal practice within the industry for over 50 years. Further, the reference to intermediate sprinklers for storage heights exceeding 4.6 m is not practical for the predominant method of storage in maturation warehouses in Scotland.

BSD and the Scottish Whisky Association (SWA) met with the British Standards Institution to understand the reasoning behind such a significant change from the previous standard BS 5306-2. Unfortunately no answers or evidence was presented at the meeting. For the purposes of compliance with building regulations, this has raised questions about the suitability of BS EN 12845 as a sprinkler installation standard for certain maturation warehouses.

BSD, the SWA, Local Authority Building Standards Scotland (LABSS) and the Scottish Fire and Rescue Service (SFRS) have been working collaboratively since then to identify solutions for individual cases throughout Scotland.

If the verifier or building warrant applicant considers there is doubt about the extent to which the proposals in the application for building warrant comply with any provision of the building regulations, the matter may be referred to Scottish Ministers who may, if they think fit, express a view on the matter. The verifier must have regard to any view expressed by Scottish Ministers before determining the building warrant application. BSD issued a Ministerial View on 11 February 2013 in relation to maturation warehouses which can be found at <http://www.scotland.gov.uk/Topics/Built-Environment/Building/Building-standards/ProceduralLegislation/ministerialviews/minview110213>.

More recently, BSD has been made aware that the Loss Prevention Council Board (LPCB) has advised all their approved sprinkler contractors to no longer issue LPCB Certificates of Conformity to the building user for sprinklers installations in maturation warehouses where there have been deviations from BS EN 12845. This has created further uncertainty with local authority verifiers, the SFRS and within the industry on the acceptability of BS EN 12845 (with deviations) as a suitable sprinkler standard for maturation warehouses in Scotland.

As a result, BSD has developed guidance on the specification and use of automatic fire suppression systems in whisky maturation warehouses.

This guidance is published on the BSD website at <http://www.scotland.gov.uk/Topics/Built-Environment/Building/Building-standards/techbooks/techhandbooks/wmwafs>

Thank you for your continued support.

Yours faithfully



Bill Dodds Head of Building Standards